

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. _____

04 - 10491 PBS

**JOEY A. SCHNOBRICH,
Plaintiff(s)**

v.

**NELSON, WATSON &
ASSOCIATES, LLC.;
GEORGE NELSON, II;
GEORGE NELSON, III,
GREG CERULLO and JOHN
DeMINICO.**

Defendants

AFFIDAVIT OF JOEY A. SCHNOBRICH

I JOEY A. SCHNOBRICH, do hereby say and depose as follows:

1. That I am the Plaintiff in the above captioned matter.
2. That I have used email to communicate with my attorney Daniel P. Tarlow, Esquire with respect to the negotiation of a dispute with Nelson, Watson and Associates, LLC regarding both my standing as a Member of said company as well as an employee.
3. That I have also used email to correspond with my Attorney James Troisi in an unrelated matter.
4. That on or about February 19, 2004 I was contacted by Jessica Petkewich, the former Administrative assistant to Nelson, Watson & Associates.

5. That as the administrative assistant at Nelson, Watson and Associates, LLC., Jessica Petkewich had access to the email account identified as gnelson@nelsonwatson.com.
6. That on or about February 19, 2004 Jessica Petkewich provided me with the attached copies of emails from the email account of George Nelson, III identified as gnelson@nelsonwatson.com.
7. That the attached emails are true and correct copies of the emails provided to me by Jessica Petkewich.
8. That I have not altered these documents in any manner.
9. That said documents demonstrate copies of private emails that I had sent and/or received to or from my attorney, Daniel P. Tarlow as well as clients and friends.
10. That I have not provided any of the defendants in the above captioned matter with authorization to access any of my private email accounts nor have I given them my passwords for any reason.
11. That upon information and belief, the Defendant John DeMinico is a person skillful and knowledgeable with respect to the use of computers and the internet.
12. That neither myself, nor any person acting under my authority forwarded the attached email documents to any of the defendants and more specifically to John DeMinico or an email address identified as gnelson@nelsonwatson.com.

Signed this 10th day of March, 2004 under the penalties of perjury.


JOEY A. SCHNOBRICH